

KTF:RWN/ED'A
F. #2024R00755

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 371)

DARYL CAMPBELL,
IAN DIEZ,
JONATHAN GUERRERO,
ABEL MORA and
MAYOVANEX RODRIGUEZ,

Case No. 25-MJ-72

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

Danielle Williams, being duly sworn, deposes and states that she is a Special Agent with the United States Attorney's Office for the Eastern District of New York duly appointed according to law and acting as such.

In and between about April 2024 and June 2024, within the Eastern District of New York and elsewhere, both dates being approximate and inclusive, the defendants DARYL CAMPBELL, IAN DIEZ, JONATHAN GUERRERO, ABEL MORA and MAYOVANEX RODRIGUEZ, together with others, being inmates of a prison, did knowingly and intentionally conspire to possess and obtain prohibited objects, to wit: marijuana, a scalpel, a cell phone charger, and tobacco cigarettes, contrary to Title 18, United States Code, Sections 1791(a)(2), 1791(b)(3), and 1791(b)(5).

(Title 18, United States Code, Section 371)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the United States Attorney's Office for the Eastern District of New York and have been involved in the investigation of numerous cases involving contraband possession, assault and other crimes occurring in federal penal institutions. I am familiar with the facts and circumstances set forth below from my participation in the investigation; review of cell phone extraction reports; review of the investigative file, including the defendants' criminal history records; and reports of other law enforcement officers involved in the investigation.

I. Background

2. The Metropolitan Detention Center (the "MDC") is an administrative security metropolitan detention center located in Brooklyn, New York. It primarily houses defendants detained prior to their trial on federal criminal charges filed in the United States District Courts for the Eastern and Southern Districts of New York. Currently, approximately 1,200 defendants are incarcerated at the MDC.

3. Incarcerated individuals at the MDC are not permitted to possess contraband inside the MDC. Title 28, Code of Federal Regulations, Section 500.1(h) defines the term "contraband," as used within the Bureau of Prisons ("BOP"), as "material prohibited by law, regulation, or policy that can reasonably be expected to cause physical injury or adversely affect the safety, security, or good order of the facility or protection of the public," which includes narcotics, cellphones, cigarettes, and alcohol, among other prohibited items.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. When inmates arrive at the MDC, they are provided with an “Inmate Admission & Orientation Handbook,” which, among other things, lists prohibited acts within the facility and the available sanctions for violations. The most serious prohibited acts are deemed the “greatest severity level prohibited acts.” One such act is the “possession, manufacture, introduction, or loss of a hazardous tool.” Such “hazardous tools” include items that are “hazardous to institutional security or personal safety; e.g., . . . portable telephone, pager, or other electronic device.” Other violations of this same severity include (1) killing; (2) escape from escort; (3) possession of a firearm; (4) rioting; (5) taking hostages and (6) sexual assault.²

5. I am aware, based on my participation in this and other investigations, as well as conversations with other law enforcement agents, that narcotics, cigarettes, and contraband cellphones, and the tools needed to charge the cellphones, are frequently smuggled into the MDC, and that inmates purchase them inside of the jail often at prices many times greater than the cost of a comparable product purchased outside of a BOP facility.

II. The Contraband Phone

6. On or about June 25, 2024, correctional officers seized one Samsung Galaxy 14 cellular telephone from a locker assigned to the defendant DARYL CAMPBELL in cell G06-421, in the G-43 housing unit on the fourth floor within the MDC (the “Contraband Phone”). When asked about the Contraband Phone, CAMPBELL disclaimed ownership of it.

7. A partial extraction of data was obtained from the Contraband Phone, including images, audio files, and other data. Your affiant has reviewed the contents of this partial extraction, which show that the defendant DARYL CAMPBELL used the Contraband

² These prohibited acts are also codified in Table 1 of 28 C.F.R. 541.3.

Phone in furtherance of a conspiracy to introduce further contraband into the MDC, as described in detail below.

8. A review of the contents of the Contraband Phone indicates that it was used by the defendant DARYL CAMPBELL and other inmates. In a voice recording on the Contraband Phone, dated April 17, 2024, a male voice states “Yo, this Tax, this my new number. You heard?” Inmate records maintained by the BOP indicate that CAMPBELL uses the alias “Taxstone” and list his occupation as “podcaster/Taxseason podcast.” I have reviewed multiple audio recordings of a publicly available podcast titled “Tax Season,” which purports to be created and hosted by “Taxstone.”³ Based on my review of recordings of CAMPBELL’s voice on the “Tax Season” podcast, I believe the person speaking in the April 17, 2024, voice recording and the other voice recordings described herein to be CAMPBELL. Further indicia of CAMPBELL’s use of the Contraband Phone include the following, among other items: (i) a Word document containing the transcript of a cooperating witness’s trial testimony in People of the State of New York v. Daryl Campbell, Ind. No. 2334/2017⁴; (ii) a screenshot of a Western Union payment to CAMPBELL’s account at the Federal Bureau of Prisons, associated with metadata indicating a date of June 10, 2024; (iii) use of the Contraband Phone to access the Twitter/X account “TAXSTONE”; and (iv) numerous voice recordings in which a male voice refers to himself as “Tax.”

³ See, e.g., “Tax Season Podcast – Apple Podcasts,” <https://podcasts.apple.com/us/podcast/tax-season/id978037629> (last accessed February 21, 2024).

⁴ This trial resulted in CAMPBELL’s conviction of manslaughter in the first degree, in violation of New York Penal Law § 125.20.

9. The Contraband Phone was found to contain several files indicating that it was used for the purchase and sale of marijuana and other substances, including: (i) photographs depicting what appears to be marijuana; (ii) numerous screenshots of payments sent via the mobile payment applications CashApp and Zelle, in amounts ranging from \$20 to \$3,000; (iii) screenshots of Uber rides with the destinations at or near the MDC; and (iv) several audio recordings in which the defendant DARYL CAMPBELL discusses the purchase and sale of marijuana and other substances. A selection of such recordings is transcribed in draft below, along with the approximate date on which each recording was created:

- a. April 20-22, 2024. I got O's for eighteen. . . . And I got grabba too. . . .
Fingers of grabba, \$300. Fuck you talking about, pussy?⁵
- b. April 22, 2024. Yo, her shit is still frozen, so what I'ma do is, I'ma just make one of these [N-word]s I sell some of this bud⁶ to send shit directly to you. Or if this [N-word] is in the Bronx, I'll just have this [N-word] give it to you in cash.
- c. April 24, 2024. Yo, see how much a pound of grabba is too.
- d. April 27, 2024. Yo, whatever plates you got right now, just give me a plate and I'll give you the bread back in like a day or two. Cause I'm gonna get that shit in tomorrow. But try and get it to me early tomorrow, like before, before 2 o'clock.

10. The Contraband Phone was also found to contain several voice recordings in which the defendant DARYL CAMPBELL provides instructions on smuggling

⁵ Based on my training, experience, and conversations with other law enforcement officers, I am aware that "O" is a slang term for an ounce, and "grabba" is a tobacco leaf product often used to wrap marijuana cigarettes.

⁶ Based on my training, experience, and conversations with other law enforcement officers, I am aware that "bud" is a slang term for marijuana.

contraband items into the MDC by attaching them to a rope that would be extended from inside of the facility. A selection of such recordings is transcribed in draft below, along with the approximate date on which each recording was created:

- a. April 19, 2024. So, you see, what you, when you, when you first walk in the building, right? There's a rec deck or whatever, there's a gate. [N-word]s gonna throw a line out. I just need you to tie the line to it. I'll have my man come scoop you up around seven. He gonna bring you down here and we'll get that situated.
- b. April 19, 2024. You know how, when you come inside the gate of the building, right when you come inside the gate, it's like a gate, it's above you. We gonna throw the line out from that gate so you just run right in the gate and you hook it to the line cause there's a hook on the end of the line we got right now. You just going to hook it and just dip back out. Sturdy.
- c. April 19, 2024. Yeah, so I'ma tell y'all when to drive up. We gonna have the line out already and I'ma just tell you drive right up, so you can get right out the car and do it. She put the hook on the line?
- d. April 25, 2024. Try to get the 50, the 50-foot rope with the hook, if not just get the 25-foot joint.
- e. April 28, 2024. [N-word]s can even use like the small sandwich bags and put about two ounces in it around in each one and tape it around the line or [N-word]s could get uh, [N-word]s could get um, the big sandwich bags and put like three ounces, four ounces in it and spread it and then tape it onto the line.

- f. April 28, 2024. Alright, hit me on Facetime just so I can show you the size right now, so I don't gotta baby you through the whole shit. Cause if I can show you the size that we gonna have to get everything on the line, you'll know how to do it.
- g. April 30, 2024. Yo, send me a picture of the line that you did and then a picture of the line that shorty did. I don't know if we gonna, I wanna make sure that everything slides through that hole. I don't wanna make no mistakes because this run that we do is gonna be a run that put me right back where I need to be to pay these white people off, and I'll be able to bust the moves that we really bust, because this is really like light money moves to us. You smell me? And I'll be right back where I need to be, where I'll be able to pay this Uber 20,000 every trip to come see me. Cause I'm like, we need to really make this shit efficient, you know what I mean? I wanna get like 30 nips on the line, but I wanna make sure everything that is on the front of the line is going to slide through first, cause the [N-word] was showing me his hand and showing me how he was pulling the line mad hard and the shit wasn't coming and shit because certain shit was stuck, because certain shit was too big for the hole, you smell me?
- h. May 12, 2024. Yo, you gonna grab this other little piece of line my son just did and just attach it at the bottom. You gotta do shit for [N-word]s like that in here or these [N-word]s will rat on you. I just told that [N-word] all right, so she just switched the destination to the Uber to Gates. So you gonna grab that shit from Gates and then come straight here.

11. Based on my review of recordings of the defendant DARYL CAMPBELL's voice as described in ¶ 8 above, I believe the person speaking in each of the aforementioned voice recordings to be CAMPBELL. On each of the dates listed, CAMPBELL was incarcerated at the MDC.

Communications with Co-Conspirator 1

12. The partial extraction of the Contraband Phone indicate that the Contraband Phone was associated with the phone numbers (929) 549-0085 and (929) 276-7430. Records maintained by T-Mobile indicate that the Contraband Phone communicated with a phone number associated with Co-Conspirator 1⁷ numerous times in April and May of 2024, including through over thirty phone calls and over twenty-five SMS text messages. Between April and June 2024, Co-Conspirator 1 was not a registered inmate at the MDC.

13. The Contraband Phone was also found to contain a screenshot of an Uber ride, associated with metadata indicating a date of May 12, 2024, from 373 Gates Avenue, Brooklyn, New York, to 80 29th Street, Brooklyn, New York—the address of the MDC. This screenshot contains the following text above the pickup location: “[Co-Conspirator 1's First Name] is waiting for pickup.” Notably, in the voice recording described in ¶ 10(h) above, made on the same date, the defendant DARYL CAMPBELL instructs another individual to grab a “piece of line,” attach an object to the bottom, then take an Uber from “Gates” to the MDC. This is consistent with CAMPBELL using the Contraband Phone to arrange transportation for Co-Conspirator 1 to bring contraband items to the MDC.

⁷ Co-Conspirator 1 provided this phone number to New York City Police Department (“NYPD”) officers in connection with a reported domestic incident on or about April 13, 2024.

14. The Contraband Phone was also found to contain a screenshot, associated with metadata indicating a date of June 1, 2024, of a hotel reservation listing the name Co-Conspirator 1, and several images of Co-Conspirator 1, including headshots and full body images. In these images, a distinctive cursive tattoo on the right side of Co-Conspirator 1's neck is visible, consistent with a photograph of Co-Conspirator 1 obtained from law enforcement databases.

III. June 30, 2024, Attempt to Smuggle Contraband

15. On or about June 30, 2024, the defendants DARYL CAMPBELL, IAN DIEZ, JONATHAN GUERRERO, ABEL MORA, and MAYOVANEX RODRIGUEZ, along with Co-Conspirator 1, attempted to smuggle marijuana, a scalpel, a phone charger, tobacco cigarettes, and other items into the MDC by the same method that CAMPBELL described in the voice recordings on the Contraband Phone.

16. On or about June 30, 2024, at approximately 1:51 p.m., MDC employees observed Co-Conspirator 1 and another unidentified individual drive to the front entrance of the MDC in a black Honda Accord. Co-Conspirator 1 exited the vehicle from the passenger side door and approached the main front entrance into the West building of the MDC. Co-Conspirator 1 held an orange tote bag and stood outside the entrance looking in the direction above the doors leading to the main entrance, as depicted in Figure 4. Co-Conspirator 1 wore the same black sneakers with grey soles and a horizontal grey stripe as he did in a photograph recovered from the Contraband Phone.

17. Co-Conspirator 1 then left the area near the main front entrance, walked to a black Honda Accord that was in the MDC parking lot and entered that car. Approximately ten minutes later, at or around 2:03 p.m., Co-Conspirator 1 again approached the main front entrance

holding the same orange tote bag. Co-Conspirator 1 was observed manipulating a grey object within the orange tote bag, and removed the grey object, which appeared to be a long grey rope, from the orange tote bag. Co-Conspirator 1 threw the grey rope up towards the recreation deck directly above the MDC main front entrance, and the grey rope attached to an object protruding from the fourth floor recreation deck. Housing unit G-43 is located on the fourth floor of the MDC. Co-Conspirator 1 was then approached by a MDC staff member and fled by getting in to the black Honda Accord.

18. On or about June 30, 2024, between approximately 1:46 p.m. and 2:06 p.m., video surveillance from inside of the G-43 Housing Unit Recreation Deck and surrounding areas depicts the defendants IAN DIEZ, JONATHAN GUERRERO, ABEL MORA, and MAYOVANEX RODRIGUEZ, all of whom were MDC inmates, enter the recreation deck, stack various objects to enable one of them to climb to the window at the top of the room, and then manipulate a rope hanging from the window. MDC personnel who are familiar with DIEZ, GUERRERO, MORA, and RODRIGUEZ have identified each of them from this video surveillance.

19. At approximately 1:46 p.m., the defendant IAN DIEZ is captured on video surveillance pushing a food cart into the recreation deck. At approximately 1:47 p.m., the defendant ABEL MORA is captured on video surveillance carrying a chair into the recreation deck, followed closely by the defendant JONATHAN GUERRERO. Still images from video surveillance depicting the inmates identified as DIEZ (left, pushing a food cart), MORA (right center, carrying a chair), and GUERRERO (far right) walking into the recreation deck are shown below:



20. As depicted in the surveillance footage, once inside the recreation deck, the defendants IAN DIEZ, JONATHAN GUERRERO and ABEL MORA place the chair and a garbage bin on top of the food cart, and then push them to the far corner of the room underneath a set of windows that face out of the jail. GUERRERO then climbs to the top of the window and appears to manipulate an object through the window as DIEZ and MORA look on. MORA then exits the recreation deck and stands outside, looking around in a manner consistent with serving as a lookout, as GUERRERO climbs to the top of the window.

21. Shown below are: (i) a still image from approximately 1:48 p.m. depicting the defendants IAN DIEZ and ABEL MORA pushing the food cart towards the window; (ii) a still image from approximately 1:49 p.m. depicting the defendant JONATHAN GUERRERO manipulating an object through the window as DIEZ and MORA stand below; and (iii) a still image from approximately 1:50 p.m. depicting GUERRERO climbing the window as DIEZ looks on.



22. As depicted in the surveillance footage, for the next approximately ten minutes, the defendant JONATHAN GUERRERO appears to be manipulating an object at the window as the defendant IAN DIEZ watches from below. The defendant ABEL MORA stands outside of the recreation deck, periodically entering, appearing to speak to his co-conspirators, and then exiting. At approximately 2:00 p.m., DIEZ and GUERRERO walk away from the window, with GUERRERO pushing the food cart. Shortly thereafter, DIEZ, MORA, and GUERRERO all run back toward the window, with MORA pushing the food cart. At approximately 2:03 p.m., video surveillance captures what appears to be a rope hanging from the window. Shown below is a still image from approximately 2:03 p.m., depicting MORA holding the rope (circled in red) as DIEZ and GUERRERO approach the window:



23. As depicted in the surveillance footage, and as positively identified by MDC personnel, at approximately 2:04 p.m., the defendant MAYOVANEX RODRIGUEZ enters the recreation deck. A still image from approximately 2:04 p.m. depicting RODRIGUEZ walking towards the recreation deck is shown below:



24. As depicted in the surveillance footage, the defendant MAYOVANEX RODRIGUEZ approaches the other inmates and begins climbing toward the same window. A still image from approximately 2:06 p.m. depicting RODRIGUEZ climbing up to the window is shown below:



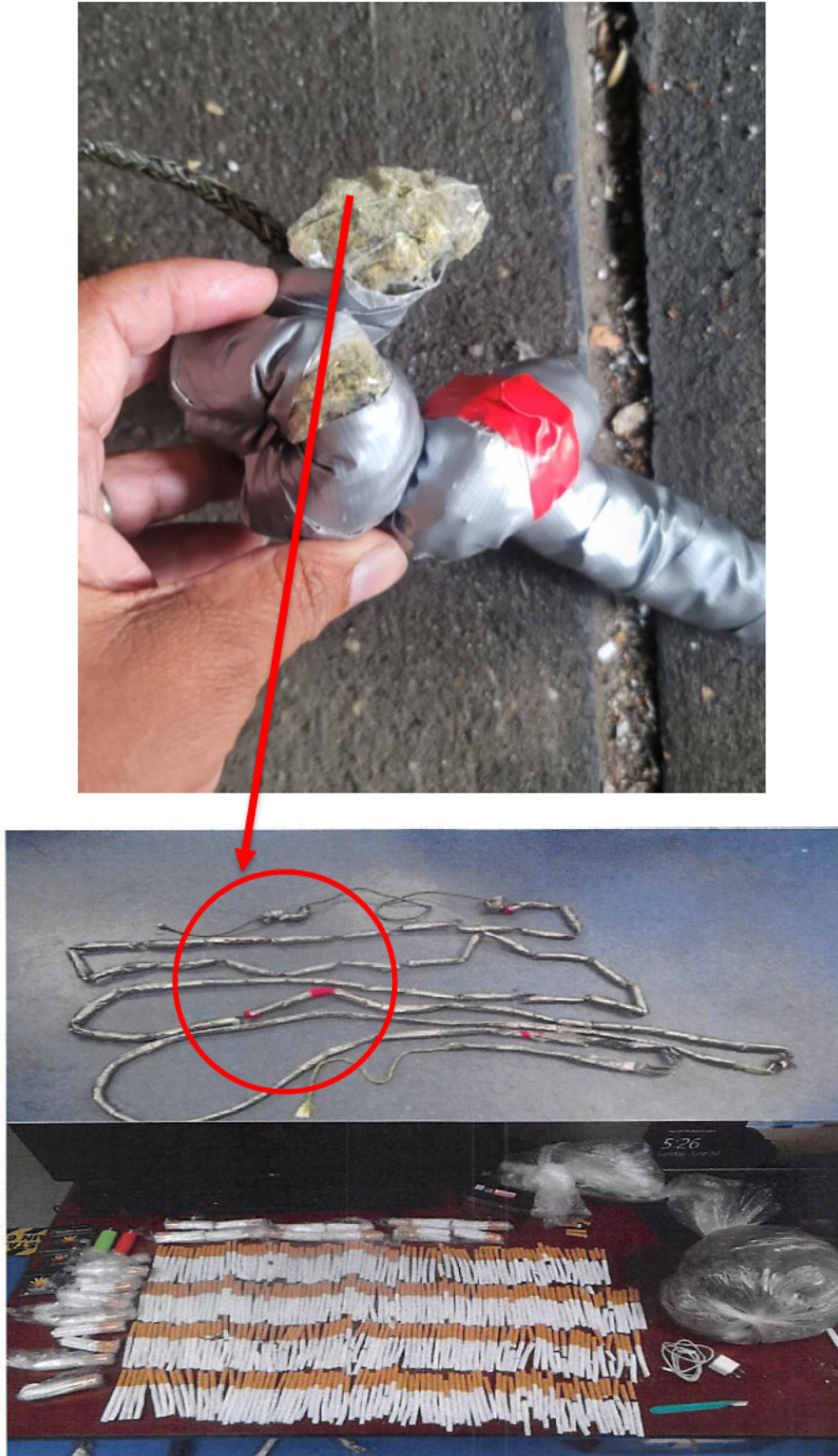
25. Shortly thereafter, the defendant MAYOVANEX RODRIGUEZ falls to the ground, and all of the inmates run out of the recreation room.

26. Personnel at the MDC recovered the rope that the defendants IAN DIEZ, JONATHAN GUERRERO, ABEL MORA and MAYOVANEX RODRIGUEZ were pulling on from the inside of the MDC, and found that it had been attached to the same silver rope that Co-Conspirator 1 had brought to the MDC and thrown upwards towards the G-43 recreation deck window. A photograph of the rope hanging from the window of the G-43 recreation deck is shown below.



27. This rope was recovered by MDC staff and was found to consist of materials packed within duct tape, shaped in a rope-like manner. Within the duct tape packaging, the grey rope contained, among other items, pieces of paper covered in a powdery substance, over 100 strips of film believed to be Suboxone, approximately 27 small bags containing a green leafy substance (which a field test confirmed to be marijuana), approximately three bags of “Hot Graba” brand wrapping leaf⁸, a scalpel, a cell phone charging cord and plug, two lighters, and over 400 cigarettes, as depicted below.

⁸ These are consistent with the items mentioned in the voice recordings described in ¶¶ 9(a) and 9(c) above, in which CAMPBELL states that he has “grabba” for sale and asks the price of a pound of “grabba.”



WHEREFORE, your deponent respectfully requests that the defendants DARYL CAMPBELL, IAN DIEZ, JONATHAN GUERRERO, ABEL MORA and MAYOVANEX

RODRIGUEZ, be dealt with according to law.

/s/ Danielle Williams

Danielle Williams
Special Agent, United States Attorney's Office,
Eastern District of New York

Sworn to before me this 5th day of
March, 2025 by telephone

James R. Cho

THE HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK